

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:14-CR-23-Y
	§	
CHRISTOPHER ROBERT WEAST (1)	§	

MOTION TO CONTINUE TRIAL AND
MOTION TO ENLARGE TIME TO FILE PRETRIAL MOTIONS

TO THE HONORABLE TERRY R. MEANS, UNITED STATES DISTRICT JUDGE:

COMES NOW, Christopher Robert Weast, defendant, through counsel Assistant Federal Public Defender Angela R. Saad, and hereby moves the Court for an order continuing trial in this case, which is set for April 14, 2014, and for a finding of excludable time under the Speedy Trial Act as found in Title 18, United States Code, Sections 3161, et seq., for the reason, summarily stated, that the ends of justice outweigh the best interests of the public and the defendant in a speedy trial as the same is specifically defined in the aforesaid Act. The defendant states further that the factors to be considered in this motion in making the findings requested are included in the aforesaid Act in Section 3161, paragraph (h). In addition, defendant hereby requests that the Court enlarge the time for the filing of the defendant's pretrial motions.

The defendant was arrested on February 21, 2014 and the defendant was ordered to be detained on March 3, 2014. The current trial setting of April 14, 2014, does not allow counsel to effectively prepare Defendant's case for trial. Counsel needs to conduct a proper investigation of this case, in order to render effective assistance of counsel, which will not likely be completed at the current trial schedule. The defendant was incarcerated at Parker County Jail. Defense counsel

received discovery in this case on March 6, 2014 and March 7, 2014. The Court had set the deadline for filing pretrial motions for March 17, 2014. Counsel attempted to meet with the defendant on March 4, 2014 and March 5, 2014 at Parker County Jail and the Federal Correctional Institution–Fort Worth, respectively. However, the defendant was transferred to the Palo Pinto County Jail. On March 10, 2014, defense counsel conferred with the defendant regarding the discovery. The discovery has not been Defense would like additional time to confer with the defendant and complete any necessary investigation. Specifically, a forensic investigation in this case has not been conducted due to the leave schedule for our investigator.

WHEREFORE, the Defendant respectfully requests that the court continue this matter for at least thirty (30) days to allow Counsel to be fully prepared for all aspects of his representation of the Defendant and that the court continue the pretrial scheduling order accordingly to allow the defendant to file pretrial motions. In addition, defense requests that the Court enlarge the time for filing pretrial motions.

Respectfully submitted,

JASON HAWKINS
Federal Public Defender
Northern District of Texas

BY: /s/ Angela R. Saad
ANGELA R. SAAD
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CERTIFICATE OF SERVICE

I, Angela R. Saad, hereby certify that on March 17, 2014, I electronically filed the foregoing memorandum with the clerk for the U.S. District Court, Northern District of Texas, using the electronic filing system for the court. The electronic case filing system sent a “Notice of Electronic Filing” to AUSA Aisha Saleem, who presumably has consented in writing to accept this Notice as service of this document by electronic means.

/s/ Angela R. Saad
ANGELA R. SAAD

CERTIFICATE OF CONFERENCE

I hereby certify that I, Angela Saad, attorney for the defendant, did confer with Aisha Saleem, the Assistant United States Attorney assigned to this matter who stated that she would not oppose this motion.

/s/ Angela R. Saad
ANGELA R. SAAD